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H. R. Gentsch
President and
Chief Executive Officer

March 5, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications Commission ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for HTC Communications Co., ("HTC") regarding the Connect America Phase II network experiments. HTC appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,



H.R. Gentsch
President & CEO
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618-939-6102

Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

HTC Communications Co., (“HTC”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is Stage 1 of the FCC’s Phase II experiment proposals and HTC anxiously awaits release of the Stage 2 formal proposal requirements.

Background

HTC is certificated as a competitive local exchange carrier (“CLEC”) in Illinois. HTC is an affiliate of, and operated by, Harrisonville Telephone Company, (“Harrisonville”). Harrisonville is a certificated rural incumbent local exchange carrier in southwest Illinois and has a proven success rate of deploying rural high-speed last mile broadband networks. Harrisonville has been in the telecommunications industry for 118 years deploying high quality voice and has provided broadband services for nearly 20 years. Harrisonville currently serves 12,500 voice and 10,000 broadband customers, offering 50 Mbps service to over one-half its market area. HTC intends to leverage the network capabilities of Harrisonville to serve the proposed service area addressed in this EOI. HTC does not currently have Eligible Telecommunication Carrier (“ETC”) status and will file for such upon a successful application for project funding through the Connect America Phase II Rural Broadband Experiments.

Proposed Service Area

The proposed service area covers the following census tract numbers which are located in Monroe and St. Clair counties of Illinois: 17133600401, 17133600501, 17133600502, 17163503100, 17163503203, 17163503906, and 17163504001. The project is estimated to provide broadband access to a total of 1,257 Eligible High Cost locations and 46 locations considered as Extremely High Cost locations. These Eligible High Cost locations lie adjacent to the current service territory of Harrisonville. HTC plans to place facilities to “edge out” from the existing Harrisonville network to serve these locations. Available information implies that the proposed service area consists predominantly of out of town rural residential and business locations.

Broadband Technology

HTC anticipates using Fiber to the Home ("FTTH") for this proposed project area in order to build a high-speed, robust, scalable broadband network. This technology is chosen for the following reasons:

- Delivers a State of the Art communications network into area homes or businesses
- Delivers high quality voice services
- Delivers scalable broadband capabilities up to 1Gbps
- Ensure the latest technology for current and future networks

Service Offerings

The service offerings anticipated by HTC are voice service, high-speed broadband service, and video service. Speed tiers of 15Mbps to 1Gbps are expected to be available to all homes and businesses passed, including CAIs within the proposed project area. HTC IP Television ("IPTV") is the nature of the video service. HTC estimates the project to be completed within a 36-month period after award.

Local Telephone (voice) Service. Delivered via the latest fiber and IP communications technology to ensure the utmost in quality and reliability.

- Pinpoint 911 accuracy
- The most reliable service
- Unlimited local minutes
- Free incoming calls
- Long distance services
- Options for discounted bundles

High-Speed Broadband Service. Delivered via the latest fiber technology to support a wide variety of broadband speeds.

- Speeds ranging from 15Mbps to 1Gbps
- Service supports asymmetrical and symmetrical broadband speeds
- Speeds available to all residential, business and CAI's, within the Proposed Service area
- Broadband service delivery mirrors the current services provided within the adjacent incumbent Harrisonville serving area

HTC IP Television (IPTV). HTC Ultimate Entertainment provides the latest in TV Technology via the fiber broadband network.

- More than 300 all-digital channels including; 161 Standard Digital channels, 95 Premium channels, 50 Music channels
- Digital Video Recorder (DVR) capabilities
- Caller ID delivered to TV
- TV Everywhere
- Video on Demand (VOD)

Other Government/Tribal Participation

This project is not anticipated to include any State, Local or Tribal government support.

Funding

HTC is unable to determine a total cost of the proposed project since the eligible unserved high cost census blocks within the Proposed Service area census tracts have yet to be identified, however HTC estimates this project to have a total cost of around \$7M. The requested funding amount will be one-time support. The funding request is necessary to assist in the deployment of advanced communications services in these rural Illinois areas. Once the final rules and budget for the Rural CAF Experiment are released by the FCC, HTC will better define the project and costs applicable should a formal proposal be submitted.

Conclusion

The Proposed Service area is currently served via Frontier Communications and limited point-to-point wireless service. With the expansion of the HTC network into these adjacent areas, end users will have the opportunity to experience the latest in voice, broadband and TV services. In addition, this expansion will aid deployment for Community Anchor Institutions, such as post offices, libraries and the Career Center of Southern Illinois educational institution.

To ensure these enhanced services can economically be deployed and supported in these low density rural areas, a funding support mechanism will assist in the deployment and ongoing support of services for locations that are currently underserved.

With Harrisonville's and HTC's technology commitment and past track record as a leader in broadband deployments, as illustrated in the National Broadband mapping, these new Proposed Service areas will receive this same commitment ensuring end users in these proposed areas can now experience the best in communications and broadband services, if funded.